Ms. Linda Hildebrand
Freudenberg - NOK General Partnership
P.O. Box 150
Ligonier, IN 46767

Re: **113-12453**
First Administrative Amendment to
Part 70 113-7644-00023

Dear Ms. Hildebrand:

Freudenberg - NOK was issued a Part 70 permit on June 30, 2000 for the operation of rubber product manufacturing processes in Plant 1, and the production of automobile parts in Plant 2. The Significant Source Modification 113-12104 that was received on March 23, 2000 will be incorporated into the Part 70 permit. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a rubber product manufacturing process in Plant 1, and an automobile parts production in Plant 2.

Responsible Official:	~~James Littich~~ **Steve Sperlava**
Source Address:	Plant 1: 1497 Gerber Street, Ligonier, IN 46767 Plant 2: 1496 Gerber Street, Ligonier, IN 46767
Mailing Address:	P.O. Box 150, Ligonier, IN 46767
Phone Number:	(219) 894-7184
SIC Code:	3061, 3499
County Location:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) ~~Four (4)~~ **Five (5)** Chain-on-Edge coaters, described as follows:

(1) One (1) East Chain-on-Edge coater, identified as COE #1, with a maximum capacity of 800 parts per hour, using dry filters as control, and exhausting to stacks EO3 and EO4.

(2) One (1) West Chain-on-Edge coater, identied as COE #2, with a maximum capacity of 800 parts per hour, using dry filters as control, and exhausting to stacks EO1 and EO2.

(3) One (1) North Chain-on-Edge coater, identified as COE #3, with a maximum capacity of 900 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(4) One (1) C-170 coater, identified as COE #4, with a maximum capacity of 4600 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(5) One (1) Chain-on-Edge coater, identified as COE #5, with a maximum capacity of 5000 units per hour, using dry filters as control, and exhausting to one (1) stack identified as #5 COE.

(b) One (1) Ford 6.8/2.5 line, consisting of:

(1) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11 and

(2) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to stack

(3) One (1) NMP washer, using no control, exhausting to stack S-14.

(4) One (1) spray booth, P-1, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control

(5) One (1) NMP cold cleaner, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere.

(c) One (1) Ford 5.4 line, consisting of:

(1) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11 and S-23.

(2) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to stack S-12.

(3) One (1) NMP washer, using no control, exhausting to stack S-14.

(4) One (1) spray booth, P-2, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control.

(d) One (1) Honda Accord line, consisting of:

(1) One (1) NMP washer, using a non chlorinated solvent, with a capacity of 550 pounds of rubber and metal parts per hour, using no control, and exhausting to general ventilation.

(2) One (1) adhesive roll coater, using no control, and exhausting to general ventilation.

(3) One (1) water based spray booth, using dry filters as control, and exhausting to general ventilation.

(e) One (1) 2001 Civic line, consisting of:

(1) One (1) NMP cold cleaner, with a maximum capacity of one hundred (100) units per hour, using no control, and exhausting to the atmosphere.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
~~Four (4)~~ **Five (5)** Chain-on-Edge coaters, described as follows:

(a) One (1) East Chain-on-Edge coater, identified as COE #1, with a maximum capacity of 800 parts per hour, using dry filters as control, and exhausting to stacks EO3 and EO4.

(b) One (1) West Chain-on-Edge coater, identied as COE #2, with a maximum capacity 800 parts per hour, using dry filters as control, and exhausting to stacks EO1 and EO2.

(c) One (1) North Chain-on-Edge coater, identified as COE #3, with a maximum capacity 900 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(d) One (1) C-170 coater, identified as COE #4, with a maximum capacity 4600 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(e) **One (1) Chain-on-Edge coater, identified as COE #5, with a maximum capacity of 5000 units per hour, using dry filters as control, and exhausting to one (1) stack identified as #5 COE.**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC)

(a) The VOC input to each of COE#1, COE#2, and COE#4, coaters shall each be limited to less than 25 tons per year, so that the requirements of 326 IAC 8-1-6 does not apply.

(b) Any change or modification to the COE#1 through COE#3, that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

(c) Any change or modification to the COE#5, which would increase the potential to emit VOC from the coating of rubber to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-1-3.4]

Pursuant to R 113-10131-00023, issued on September 11, 1998,

(a) The input of a single hazardous air pollutant (HAP) and the combined HAPs including clean-up solvent, minus solvent shipped outside, delivered to the applicators of the coater, CEO#4, shall be limited to less than 10 and 25 tons per year, rolled on a monthly basis, respectively. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-1-3.4 will not apply.

(b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 0.75 ton per month for a single HAP and 2.0 tons per month for combined HAPs.

D.1.2a Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Any change or modification which would increase the potential to emit VOC from coating metal in the emission unit to fifteen (15) pounds per day or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-2-9.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the COE#1 through COE#~~4~~ **#5** shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM compliance with the VOC and HAPs limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control in COE#3 **and COE#5** shall be in operation at all times when the chain-on-edge coaters are in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, EO1 through EO4, **#5 COE,** and AS2-1, while one or more of the spray booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures (if any) shall be performed as prescribed in the Preventive Maintenance Plan.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) Ford 6.8/2.5 line, consisting of:

(a) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11.

(b) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to general ventilation.

(c) One (1) NMP washer, using no control, exhausting to general ventilation.

(d) One (1) spray booth, P-1, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control, exhausting to general ventilation.

(e) One (1) NMP cold cleaner, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere.

One (1) 2001 Civic line, consisting of:

(a) One (1) NMP cold cleaner, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.3 Degreasers [326 IAC 8-3-2] [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-2, the owner or operator of the NMP washer cold cleaning facilities on the Ford 6.8/2.5 Line **and the 2001 Civic Line** shall:

(1) equip the cleaner with a cover;

(2) equip the cleaner with a facility for draining cleaned parts;

(3) close the degreaser cover whenever parts are not being handled in the cleaner;

(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) provide a permanent, conspicuous label summarizing the operation requirements;

(6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(1) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the NMP washers, cold cleaner degreaser facilities on the the Honda Accord Line, Ford 5.4 Line, **2001 Civic Line,** and the Ford 6.8/2.5 Line, shall ensure that the following control equipment requirements are met:

(A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(i) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(ii) the solvent is agitated; or

(iii) the solvent is heated.

(B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(ii) A water cover when solvent is used is insoluble in, and heavier than, water.

(iii) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(2) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(i) Close the cover whenever articles are not being handled in the degreaser.

(ii) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(ii) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

The permit cover page and table of contents will also be updated to include the above referenced information. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

Operation of the new equipment incorporated into the Part 70 operating permit by this amendment may commence operation upon issuance of this approval. This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley at (973) 575-2555, extension 3284.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
LQ/EVP
cc: File - Noble County
U.S. EPA, Region V
Noble County Health Department

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Freudenberg - NOK General Partnership
Plant 1: 1497 Gerber Street
Plant 2: 1496 Gerber Street
Ligonier, Indiana 46767

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T113-7644-00023	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:
First Administrative Amendment No.: 113-12453-00023	Pages Affected: 2 - 6a, 27 - 33, 48a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
D.3.6 Particulate Matter (PM)

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Emergency/Deviation Occurrence Report
Quarterly Report
Quarterly Report
Quarterly Report
Quarterly Compliance Monitoring Report
Source Modification Certification

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a rubber product manufacturing process in Plant 1, and an automobile parts production in Plant 2.

Responsible Official:	Steve Sperlava
Source Address:	Plant 1: 1497 Gerber Street, Ligonier, IN 46767
	Plant 2: 1496 Gerber Street, Ligonier, IN 46767
Mailing Address:	P.O. Box 150, Ligonier, IN 46767
Phone Number:	(219) 894-7184
SIC Code:	3061, 3499
County Location:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD Rules;
	Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Five (5) Chain-on-Edge coaters, described as follows:

(1) One (1) East Chain-on-Edge coater, identified as COE #1, with a maximum capacity of 800 parts per hour, using dry filters as control, and exhausting to stacks EO3 and EO4.

(2) One (1) West Chain-on-Edge coater, identied as COE #2, with a maximum capacity of 800 parts per hour, using dry filters as control, and exhausting to stacks EO1 and EO2.

(3) One (1) North Chain-on-Edge coater, identified as COE #3, with a maximum capacity of 900 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(4) One (1) C-170 coater, identified as COE #4, with a maximum capacity of 4600 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(5) One (1) Chain-on-Edge coater, identified as COE #5, with a maximum capacity of 5000 units per hour, using dry filters as control, and exhausting to one (1) stack identified as #5 COE.

(b) One (1) Ford 6.8/2.5 line, consisting of:

(1) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11 and

(2) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to stack

(3) One (1) NMP washer, using no control, exhausting to stack S-14.

(4) One (1) spray booth, P-1, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control.

(5) One (1) NMP cold cleaner, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere.

(c) One (1) Ford 5.4 line, consisting of:

(1) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11 and S-23.

(2) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to stack S-12.

(3) One (1) NMP washer, using no control, exhausting to stack S-14.

(4) One (1) spray booth, P-2, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control.

(d) One (1) Honda Accord line, consisting of:

(1) One (1) NMP washer, using a non chlorinated solvent, with a capacity of 550 pounds of rubber and metal parts per hour, using no control, and exhausting to general ventilation.

(1) One (1) adhesive roll coater, using no control, and exhausting to general ventilation.

(2) One (1) water based spray booth, using dry filters as control, and exhausting to general ventilation.

(e) One (1) 2001 Civic line, consisting of:

(1) One (1) NMP cold cleaner, with a maximum capacity of one hundred (100) units per hour, using no control, and exhausting to the atmosphere.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (NMP Washers cold cleaners)

(b) Four (4) Electric curing ovens, identified as PCO1 through PCO4,

(1) PCO1, with a maximum capacity of 75 pounds per hour, using no control, and exhausting to stack E32.

(2) PCO2, with a maximum capacity of 28.5 pounds per hour, using no control, and exhausting to stack V1.

(3) PCO3, with a maximum capacity of 28.5 pounds per hour, using no control, and exhausting to stack V2.

(4) PCO4, with a maximum capacity of 28.5 pounds per hour, using no control, and exhausting to stack V3.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Five (5) Chain-on-Edge coaters, described as follows:

(a) One (1) East Chain-on-Edge coater, identified as COE #1, with a maximum capacity of 800 parts per hour, using dry filters as control, and exhausting to stacks EO3 and EO4.

(b) One (1) West Chain-on-Edge coater, identied as COE #2, with a maximum capacity 800 parts per hour, using dry filters as control, and exhausting to stacks EO1 and EO2.

(c) One (1) North Chain-on-Edge coater, identified as COE #3, with a maximum capacity 900 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(d) One (1) C-170 coater, identified as COE #4, with a maximum capacity 4600 parts per hour, using dry filters as control, and exhausting to stack AS2-1.

(e) One (1) Chain-on-Edge coater, identified as COE #5, with a maximum capacity of 5000 units per hour, using dry filters as control, and exhausting to one (1) stack identified as #5 COE.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC)

(a) The VOC input to each of COE#1, COE#2, and COE#4 coaters shall each be limited to less than 25 tons per year, so that the requirements of 326 IAC 8-1-6 does not apply.

(b) Any change or modification to the COE#1 through COE#3 that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-1-3.4]

Pursuant to R 113-10131-00023, issued on September 11, 1998,

(a) The input of a single hazardous air pollutant (HAP) and the combined HAPs including clean-up solvent, minus solvent shipped outside, delivered to the applicators of the coater, CEO#4, shall be limited to less than 10 and 25 tons per year, rolled on a monthly basis, respectively. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-1-3.4 will not apply.

(b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 0.75 ton per month for a single HAP and 2.0 tons per month for combined HAPs.

(c) Any change or modification to the COE#5, which would increase the potential to emit VOC from the coating of rubber to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.1.2a Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Any change or modification which would increase the potential to emit VOC from coating metal in the emission unit to fifteen (15) pounds per day or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-2-9.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the COE#1 through COE#5 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM compliance with the VOC and HAPs limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control in COE#3 and COE#5shall be in operation at all times when the chain-on-edge coaters are in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, EO1 through EO4, #5 COE, and AS2-1, while one or more of the spray booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures (if any) shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and/or D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and/or D.1.2.

(1) The amount and VOC content of each coating material and solvent used on COE#1 and COE#2, and the amount of HAP and VOC content of each coating material and solvent used on COE#4. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The total VOC usage on COE#1 and COE#2, and the single and total HAPs and VOC usage on COE#4, for each month; and

(4) The weight of VOCs on COE#1 and COE#2, and the HAPs and VOC on COE#4, emitted for each compliance period.

(b) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) Ford 6.8/2.5 line, consisting of:

(a) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11.

(b) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to general ventilation.

(c) One (1) NMP washer, using no control, exhausting to general ventilation.

(d) One (1) spray booth, P-1, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control, exhausting to general ventilation.

(e) One (1) NMP cold cleaner, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere.

One (1) 2001 Civic line, consisting of:

(a) One (1) NMP cold cleaner, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of extreme duty and/or air dried coatings delivered to the applicator at the Ford 6.8/2.5 spray booth P-1 and the roll coaters shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from P-1 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.3 Degreasers [326 IAC 8-3-2] [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-2, the owner or operator of the NMP washer cold cleaning facilities on the Ford 6.8/2.5 Line and the 2001 Civic Line shall:

(1) equip the cleaner with a cover;

(2) equip the cleaner with a facility for draining cleaned parts;

(3) close the degreaser cover whenever parts are not being handled in the cleaner;

(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) provide a permanent, conspicuous label summarizing the operation requirements;

(6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(1) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the NMP washers, cold cleaner degreaser facilities on the the Honda Accord Line, Ford 5.4 Line, 2001 Civic Line, and the Ford 6.8/2.5 Line, shall ensure that the following control equipment requirements are met:

(A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(i) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(ii) the solvent is agitated; or

(iii) the solvent is heated.

(B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(ii) A water cover when solvent is used is insoluble in, and heavier than, water.

(iii) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(2) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(i) Close the cover whenever articles are not being handled in the degreaser.

(ii) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(ii) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for P-1 and its control device.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limit specified in Condition D.2.1 and D.2.2, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation and control emissions from the spray booth P-1at all times that the spray booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Visible Emissions Notations

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the exhaust and the presence of overspray on the surrounding area. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Freudenberg - NOK General Partnership
Source Address: Plant 1: 1497 Gerber Street, Ligonier, Indiana 46767
Plant 2: 1496 Gerber Street, Ligonier, Indiana 46767
Mailing Address: P.O. Box 150, Ligonier, Indiana 46767
Source Modification No.: SSM 113-12104-00023

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date: